



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



478896

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Ceiling Increase and Change in the Scope of Response Request
ACTION MEMORANDUM - Request for Time-Critical Removal Action at the
Hoosier Wood Preservers Site, Indianapolis, Marion County, Indiana (Site ID #
C57K)

FROM: Shelly Lam, On-Scene Coordinator
Emergency Response Branch 1/Response Section 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

This memorandum requests and documents your approval to expend up to \$1,750,081 to conduct a time-critical removal action at the Hoosier Wood Preservers Site (the site) in Indianapolis, Marion County, Indiana. This memorandum requests a ceiling increase and change in the scope of the response. On July 7, 2015, the United States Environmental Protection Agency (EPA) approved an action memorandum for \$245,455 to conduct emergency response actions to mitigate an imminent and substantial threat of release posed by hazardous substances, pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers.

The response actions proposed in this memorandum are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the site. Arsenic has been found in soil, floor material, and ash at the site. Arsenic is a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601(14).

The time-critical removal action proposed herein is to prepare site plans, including a Work Plan, Quality Assurance Project Plan, site-specific Health and Safety Plan, and Emergency Contingency Plan; remove and treat contaminated soil and material; investigate geophysical anomalies identified by EPA during a site assessment; collect confirmation samples; replace excavated material with clean fill; conduct sampling and analysis to determine disposal options; transport and dispose off-site any hazardous substances, pollutants and contaminants at a

The site is 7.75 acres in size and has ten buildings, including process buildings, storage buildings, a garage, and office. (Figure 2). The emergency response action was the first EPA removal action there.

The site is currently abandoned and unsecured. It is not fenced on all sides and there is evidence of trespassing, such as graffiti. In addition to the fire on May 25, 2015, there is evidence of spot fires in several buildings.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

A release or threat of release of hazardous substances, pollutants, or contaminants is present at the site. EPA documented the presence of hazardous substances as defined by section 101(14) of CERCLA including arsenic above toxicity characteristic regulatory levels. Possible release mechanisms for arsenic in soil include fugitive dust generation; tracking of contaminated soil; and dermal contact with contaminated soil. Exposure routes include direct contact, ingestion or inhalation of arsenic particles in soil. Potential human receptors include trespassers, emergency response workers, future site workers, and nearby residents. There was evidence of trespassing at the site. Residential properties are located within 200 feet of the site.

5. NPL status

The site is not on the NPL.

6. Maps, pictures and other graphic representations

The following figures are attached to this memorandum.

- Figure 1 - Site Location Map
- Figure 2 - Site Layout Map
- Figure 3 - Sample Location Map

B. Other Actions to Date

a. Previous actions

As described above, IDEM issued several notices to the previous operator of the site, Hoosier Wood Preservers, Inc., for its failure to comply with certain environmental regulations at the site. IDEM also notified Hoosier Wood Preservers, Inc. of the opportunity to settle these violations and return to compliance. It is EPA's understanding that Hoosier Wood Preservers, Inc. has not responded to IDEM's notifications.

The current property owner commissioned a Phase II Subsurface Investigation in 2013 (AR Original #14). During the investigation, a limited number of soil and groundwater samples were collected. The report documented that arsenic, total chromium, hexavalent chromium, and